

**Lowenstein
Sandler****Freda Wolfson**
Chief U.S. Dist. Judge (ret.)
PartnerOne Lowenstein Drive
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E: fwolfson@lowenstein.com**SPECIAL MASTER DISCOVERY SCHEDULING ORDER**

November 21, 2024

VIA ECF and Email**TO ALL COUNSEL OF RECORD****RE: *Johnson & Johnson Health Care Systems, Inc. v. SaveOnSP, LLC***
Civ. Action No.: 22-2632(JKS)(CLW)

Having heard counsel's arguments on discovery schedule and in light of the substantial discovery disputes pending and the newly filed Amended Complaint, with the inclusion of Express Scripts, Inc ("ESI") and Accredo Health Group, Inc. ("Accredo") as named defendants, for the reasons set forth on the record on November 18, 2024, it is hereby ordered as follows:

1. The parties shall substantially complete written discovery by **June 30, 2025**, and fact discovery shall be completed by **October 31, 2025**.
2. Newly added defendants ESI and Accredo shall serve their discovery requests beginning on **January 17, 2025**;
3. Any additional requests for production of documents and written interrogatories between JJHCS and SaveOnSP must be served no later than **January 10, 2025**;
4. For current discovery that has been provided, any dispute between JJHCS and SaveOnSP on those productions shall be presented to me by **February 3, 2025**; however, should there be any additional discovery that is produced after February 3, 2025, the parties may bring their dispute(s) beyond February 3, 2025;
5. As to the number of depositions, it is premature at this time, without the full complement of discovery, to decide the appropriate number for each

party; this issue can be re-visited in April or May 2025, before the substantial completion of written discovery.

6. Because the parties have largely agreed upon the remaining discovery schedule as to expert discovery, I will adopt those schedules as follows:

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|------|-----------------------------|------------------|
| i. | Initial Expert Reports - | December 1, 2025 |
| ii. | Responsive Expert Reports - | January 3, 2026 |
| iii. | Reply Expert Reports - | February 3, 2026 |
| iv. | Deposition of All Experts - | March 3, 2026 |

7. Plaintiff shall file its motion to strike portions of Defendant SaveOnSP's Answer by **November 27, 2024**; opposition is due on **December 18, 2024**; and the reply, if any, shall be filed by **January 6, 2025**.

8. A Zoom status conference will be held on **January 22, 2025**, at **1:00 pm EST**.

/s/ Freda L. Wolfson
Hon. Freda L. Wolfson (ret.)
Special Master